

Sage Legal LLC

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June 18, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Taryn A. Merkl, U.S.M.J.
225 Cadman Plaza East
Courtroom 13D South
Brooklyn, NY 11201-1804

Re: Hernandez v. Happy Street LLC, et al.
Case No.: 1:22-cv-6918 (DG) (TAM)

Dear Judge Merkl:

This firm represents the Defendants in this case, who respectfully submit this letter in response to Plaintiff's May 30, 2025 letter and this Court's June 3, 2025 and June 11, 2025 Orders. See ECF Docket Entry 65 and Text Only Orders of the aforementioned dates.

Your undersigned apologizes for not sooner responding. However, I have been hard at work getting this case across the finish line. On June 2, 2025, I conducted a virtual meeting with my client to review the settlement agreement and submitted revisions to opposing counsel. On June 4, 2025, Plaintiff sent back a final settlement agreement which was acceptable to Defendants. On June 6, 2025, your undersigned was engaged in an all day hearing. Notwithstanding, on Saturday, June 7, 2025, Defendants sent Plaintiff an executed counterpart of the settlement agreement. Unfortunately, because the Defendants' principal is currently out of the country, it was not possible to notarize his signature, which Plaintiff insisted upon. As a result, Defendants utilized notarize.com (substantially more expensive than a regular notarization) to have the agreement notarized. Your undersigned received the notarized document from Defendants on June 17, 2025 and submitted same to Plaintiff earlier today.

Defendants trust this resolves Plaintiff's letter application, and thank this honorable Court for its time and attention to this case, as well as its invaluable assistance in settling same.

Dated: Jamaica, New York
June 18, 2025

Respectfully submitted,
SAGE LEGAL LLC
By: /s/ Emanuel Kataev, Esq.
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